

Remarks

Claims 1-20, 28-35, 37, 38, 41 and 45-57 are now pending in this application. Applicants have amended claims 1, 2, 4, 6-8, 10-12, 20, 28, and 30 and cancelled claim 21 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

Applicants submit herewith one sheet of corrected drawings including Fig. 3A, which includes reference sign 30 to indicate the facility/plant. Applicants respectfully request approval of the replacement drawings and withdrawal of the objection to the drawings.

The Examiner rejected claims 1-11, 13, 18-21, 28-32, 35, 37, 38, 41 and 46-57 under 35 U.S.C. § 102(e) as being anticipated by U.S. patent publication 2004/0176107 to Chadha. The Examiner rejected claims 33 and 34 under 35 U.S.C. § 103(a) as being unpatentable over Chadha in view of U.S. patent 6,169,761 to Marcoccia. The Examiner rejected claim 12 under 35 U.S.C. § 103(a) as being unpatentable over Chadha in view of U.S. patent publication 2003/0126622 to Cohen. The Examiner rejected claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over Chadha in view of U.S. patent publication 2004/0160342 to Curley.

Chadha does not disclose the invention recited in independent claims 1, 20 or 28 since, among other things, Chadha does not disclose a method that includes creating a model of the facility, including position coordinates for major parts of the facility, storing the model, identifying a component in the facility, placing a mobile information processing device adjacent the component and detecting position coordinates for the mobile information processing device,

determining a location of the component in the model of the facility based on the detected position coordinates for the mobile information processing device, and storing identification information of the component and position coordinates of the mobile information processing device. Rather, Chadha merely suggests a determining a location of a wireless device with a user and sending reminders of tasks to the user based upon the determined location. On the other hand, the invention recited in claims 1, 20, and 28 includes generating a model of an industrial facility. The Examiner asserts that a "location system" is a model. Chadha only discloses utilizing a wireless system to determine a location of a wireless device. For example, at paragraph 0014, Chada states, "According to the invention, a wireless device is thus enabled to trigger a reminder for a task based on the location or position of the user having the device." There is no model of an industrial facility created.

Additionally, Chadha does not disclose determining an identity of and locating a position of a component of an industrial facility with a mobile device. Chadha only discloses sending reminders to a user. Furthermore, Chadha does not disclose storing identification information of the component and position coordinates of the mobile information processing device in a location system storage system. Chadha does not disclose a model of an industrial facility or locating components of an industrial facility with a mobile device. On the other hand, paragraphs 0010-0015, 0071-0079, and 0080-0084 of the present application as published clearly describe how embodiments of the claimed invention can create a model of a facility, locate objects in the facility and incorporate the location data into the model.

In view of the above, Chadha does not disclose all elements of the invention recited in

claims 1-11, 13, 18-21, 28-32, 35, 37, 38, 41 and 46-57. Since Chadha does not disclose all elements of the invention recited in claims 1-11, 13, 18-21, 28-32, 35, 37, 38, 41 and 46-57, the invention recited in claims 1-11, 13, 18-21, 28-32, 35, 37, 38, 41 and 46-57 is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

The combination of Chadha and Marcoccia does not suggest the invention recited in claims 33 and 34 since, among other things, Marcoccia does not overcome the above-described deficiencies of Chadha. Along these lines, Marcoccia does not disclose a method that includes creating a model of the facility, including position coordinates for major parts of the facility, storing the model, identifying a component in the facility, placing a mobile information processing device adjacent the component and detecting position coordinates for the mobile information processing device, determining a location of the component in the model of the facility based on the detected position coordinates for the mobile information processing device, and storing identification information of the component and position coordinates of the mobile information processing device. The Examiner cites Marcoccia as suggesting the particular

aspects of data transmission recited in claims 33 and 34. Even if Marcoccia suggested such aspects of data transmission, Marcoccia does not suggest the above described aspects of the invention not suggested by Chadha and providing the system suggested by Chadha with the data transmission system suggested by Marcoccia would not overcome the deficiencies of Chadha. Therefore, the combination of Chadha and Marcoccia does not suggest the invention recited in claims 33 and 34.

The combination of Chadha and Cohen does not suggest the invention recited in claim 12 since, among other things, Cohen does not overcome the above-described deficiencies of Chadha. Along these lines, Cohen does not disclose a method that includes creating a model of the facility, including position coordinates for major parts of the facility, storing the model, identifying a component in the facility, placing a mobile information processing device adjacent the component and detecting position coordinates for the mobile information processing device, determining a location of the component in the model of the facility based on the detected position coordinates for the mobile information processing device, and storing identification information of the component and position coordinates of the mobile information processing device. The Examiner cites Cohen as suggesting image recognition. Even if Cohen suggested image recognition, Cohen does not suggest the above described aspects of the invention not suggested by Chadha and providing the system suggested by Chadha with image recognition would not overcome the deficiencies of Chadha. Therefore, the combination of Chadha and Cohen does not suggest the invention recited in claim 12.

The combination of Chadha and Curley does not suggest the invention recited in claims

14-17 since, among other things, Curley does not overcome the above-described deficiencies of Chadha. Along these lines, Curley does not disclose a method that includes creating a model of the facility, including position coordinates for major parts of the facility, storing the model, identifying a component in the facility, placing a mobile information processing device adjacent the component and detecting position coordinates for the mobile information processing device, determining a location of the component in the model of the facility based on the detected position coordinates for the mobile information processing device, and storing identification information of the component and position coordinates of the mobile information processing device. The Examiner cites Curley as suggesting navigation through a system. Even if Curley suggested navigation through a system, Curley does not suggest the above described aspects of the invention not suggested by Chadha and providing the system suggested by Chadha with navigation through a system would not overcome the deficiencies of Chadha. Therefore, the combination of Chadha and Curley does not suggest the invention recited in claims 14-17.

In view of the above, the references relied upon in the office action do not disclose patentable features of the claimed invention. Therefore, the references relied upon in the office action do not anticipate the claimed invention. Accordingly, Applicants submit that the claimed invention is patentable over the cited references and respectfully request withdrawal of the rejections based on the cited references.

In conclusion, Applicants respectfully request favorable reconsideration of this case and issuance of the Notice of Allowance.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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